

Remarks

This Application has been carefully reviewed in light of the Office Action (“Office Action”) mailed October 9, 2007. In order to advance prosecution of this Application, Applicants have responded to each notation by the Examiner. Claims 1-33 are pending. Applicants respectfully request reconsideration and favorable action in this case.

Claim Rejections - 35 U.S.C. § 102

The Examiner rejects Claims 1-10, 15-21, and 27-33 under 35 U.S.C. § 102(b) as being disclosed by U.S. Patent No. 6,061,650 issued to Malkin et al. (“*Malkin*”). Applicants respectfully traverse these claim rejections for the reasons discussed below.

Claim 1 teaches a method for blocking an attack on a private network, including “receiving a request for connection from an initiator” and “requesting an acknowledgement from the initiator of the request.” (emphasis added). *Malkin* fails to teach, disclose, or suggest each of these elements. *Malkin* teaches a method for “transparently providing mobile functionality to a remote node.” (Col. 1, lines 64-65). This includes a user dialing into a Remote Access Server (RAS) through a remote node. (Col. 2, lines 26-27). The RAS then generates and sends a remote authentication request to an authentication server. (Col. 2, lines 42-44). Once the user is authenticated by the authentication server, the RAS generates and sends a tunnel registration request to an appropriate gateway. (Col. 2, lines 58-61). This tunnel registration request is not “requesting an acknowledgement from the initiator of the request.” For at least these reasons, Applicants respectfully contend that Claim 1 is patentably distinguishable from *Malkin*.

Similar to Claim 1, Claims 27, 28, 30, and 32 include elements generally directed toward receiving a request for connection from an initiator and requesting an acknowledgement from the initiator of the request. Therefore, Applicants respectfully contend that Claims 27, 28, 30, and 32 are patentably distinguishable from *Malkin* for at least the same reasons discussed above with regard to Claim 1.

Claims 2-10 depend, either directly or indirectly, from Claim 1 and incorporate all the limitations thereof. Therefore, Applicants respectfully contend that Claims 2-10 are patentably distinguishable from *Malkin* for at least the same reasons discussed above with regard to Claim 1.

Claim 15 teaches a method of blocking an attack on a private network, including “receiving an incoming data packet,” “comparing a source address of the data packet against known internal addresses of the private network,” and “determining if the source address matches a known internal address.” If there is a match, Claim 15 further teaches “dropping the data packet” and “refusing to process any additional data packets received from the real source of the data packet.” In rejecting Claim 15, the Examiner relies on “the same rational [sic] as claim 1,” but completely fails to identify any elements of Claim 15 that are disclosed by *Malkin*. Nevertheless, *Malkin* fails to teach, disclose, or suggest each of the elements of Claim 15. *Malkin* teaches a method for “transparently providing mobile functionality to a remote node.” (Col. 1, lines 64-65). This includes a user dialing into a Remote Access Server (RAS) through a remote node. (Col. 2, lines 26-27). The RAS then generates and sends a remote authentication request to an authentication server. (Col. 2, lines 42-44). Once the user is authenticated by the authentication server, the RAS generates and sends a tunnel registration request to an appropriate gateway. (Col. 2, lines 58-61). However, *Malkin* fails to teach “comparing a source address of [a] data packet against known internal address of [a] private network.” *Malkin* also fails to teach “refusing to process any additional data packets received from the real source” of a data packet with a source address that matches a known internal address of the private network. For at least these reasons, Applicants respectfully contend that Claim 15 is patentably distinguishable from *Malkin*.

Similar to Claim 15, Claims 29, 31, and 33 include elements generally directed toward receiving an incoming data packet, comparing the source address of the data packet against known internal addresses of a private network, and, if there is a match, refusing to process any additional data packets received from the real source of the data packet. Therefore, Applicants respectfully contend that Claims 29, 31, and 33 are patentably distinguishable from *Malkin* for at least the same reasons discussed above with regard to Claim 15.

Claims 16-21 depend, either directly or indirectly, from Claim 15 and incorporate all the limitations thereof. Therefore, Applicants respectfully contend that Claims 16-21 are patentably distinguishable from *Malkin* for at least the same reasons discussed above with regard to Claim 15.

Claim Rejections - 35 U.S.C. § 103

The Examiner rejects Claims 11-14, and 22-26¹ under 35 U.S.C. § 103(a) as being unpatentable over *Malkin* in view of U.S. Publication No. 2003/0053170 A1 by Levinson et al. (“*Levinson*”). Applicants respectfully traverse these claim rejections for the reasons discussed below.

Claims 11-14 depend indirectly from Claim 1, and incorporate all the limitations thereof. In rejecting Claims 11-14, the Examiner relies on *Malkin* as disclosing each of the limitations of Claim 1. However, as stated above, *Malkin* fails to disclose each of the limitations of Claim 1. *Levinson* fails to cure this deficiency. Therefore, Applicants respectfully contend that Claims 11-14 are allowable for at least the same reasons as discussed above with regard to Claim 1.

Claims 22-26 depend, either directly or indirectly, from Claim 15 and incorporate all the limitations thereof. In rejecting Claims 22-26, the Examiner relies on *Malkin* as disclosing each of the limitations of Claim 15. However, as stated above, *Malkin* fails to disclose each of the limitations of Claim 15. *Levinson* fails to cure this deficiency. Therefore, Applicants respectfully contend that Claims 22-26 are allowable for at least the same reasons as discussed above with regard to Claim 15.

No Waiver

All of Applicants’ arguments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the *Malkin* and *Levinson* references. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner’s additional statements. The example distinctions discussed by Applicants are sufficient to overcome the Examiner’s rejections.

¹ Page 10 of the Office Action states that Claims 2-26 are rejected under 35 U.S.C. § 103(a), but the discussion indicates that it is actually Claims 22-26. Applicants assume the Office Action intended to reject Claims 22-26 under § 103(a).

CONCLUSION

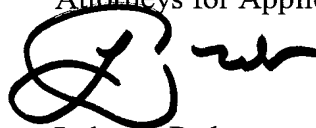
Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and full allowance of all pending Claims.

Applicants believe that no fee is due. However, the Commissioner is hereby authorized to charge any fee or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

If the Examiner feels that a conference would advance prosecution of this Application in any manner, Luke K. Pedersen stands willing to conduct such a telephone interview at the convenience of the Examiner. Mr. Pedersen may be reached at 214-953-6655.

Respectfully submitted,

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